

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION

Civil Action No. 1:17-cv-00713

AMERICAN GENERAL LIFE)	
INSURANCE COMPANY,)	
)	
Plaintiff,)	
)	
v.)	AMERICAN GENERAL
)	LIFE INSURANCE
)	COMPANY’S MOTION
)	TO DEPOSIT FUNDS
SHANNON CHEVOLA and ZACHARI)	
CHEVOLA,)	
)	
Defendants.)	
)	

Plaintiff, American General Life Insurance Company by its attorneys, the law firm of Wilson, Elser, Moskowitz, Edelman & Dicker, LLP, hereby moves for an Order from the Court to tender to the Clerk of the Court, the sum of \$500,000.00, plus accrued interest, (hereinafter “the Sum”). The Sum represents the death benefit and accrued interest as required by law, payable under life insurance policy no. YH00877801 (“the Policy”), issued by American General, to the late Robert Chevola (“Decedent”), at the time of Decedent’s death.

The Court has jurisdiction and the venue is proper as pled in the Complaint. Within that action, American General respectfully requests that this Court enter an Order to deposit the Sum into an interest-bearing account until such time as the Court makes its order directing disbursement and distribution of the funds.

American General requests an Order to deposit the Sum, with interest, because it is unable to determine to whom the life insurance benefits should be paid. Rival claimants, as pled in the Complaint, each claim entitlement to the Sum. Thus, there are

potential and actual competing claims as alleged in the complaint for the death benefit under the Policy.

Upon receipt of the Sum the Clerk of this Court is requested to deposit said Sum into an interest-bearing account until such time as the Court makes its order directing disbursement and distribution of these funds.

Respectfully submitted, this the 8th day of August, 2017.

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER, LLP,

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